

Stockholm Region Association for European Affairs position regarding the proposed regulation on the Trans-European Transport Network (TEN-T)

A sustainable, integrated, and efficient European transport system

September 2021

- Stockholm Region Association for European Affairs welcomes the revision of the TEN-T regulation and shares the European Commission's assessment that the transport sector needs to contribute more clearly to addressing climate and sustainability challenges. The association also welcomes the connection between the TEN-T and the European Green Deal.
- We welcome the extension of the Scandinavian-Mediterranean (ScanMed) corridor in the northern direction and consider that the inclusion of the Oslo-Stockholm axis in the corridor and the possibility for the Port of Stockholm to obtain core network status, would further improve the functionality and efficiency of the network.
- We consider that the main focus of the TEN-T should continue to be the development of transport infrastructure while strengthening the quality of existing infrastructure, digitalisation, and innovation.
- We see digitalisation as a tool to achieve a more efficient and sustainable transport system but note that the implementation costs for this can not only be carried by municipalities and regions, and that additional funds need to be made available for the implementation.
- We emphasise the importance of a holistic perspective and a technology-neutral approach where several measures – behavioural change, multimodality, innovation, digitalisation, sustainable fuels – interact to achieve the climate goals for the transport sector. The holistic perspective also includes a synchronisation of the TEN-T regulation with other EU initiatives and that a systemic approach is adopted where the transport sector is placed in relation to other sectors where socially important services need to be delivered.
- We underline that in connection to the revision, the entire functional area needs to be considered when granting core network status for port activities.
- We emphasise the importance of a broader definition of urban nodes to include the entire functional area around the node, which includes peri-urban and regional areas around a city centre; as well as that the Motorways of the Sea shall be integrated and given the same importance within the TEN-T as other infrastructure to increase functionality and the efficiency of the transport system.
- We consider a fruitful dialogue regarding the European transport system between the EU and the regional level, as well as with the macro-regional level, as a prerequisite for meeting the opportunities and needs of infrastructure development at different levels. We are positive to continue the successful governance model with corridor coordinators and the meetings organised with stakeholders along each corridor.

The Stockholm Region in the European transport system – the need to extend the Scandinavian-Mediterranean corridor

Reliable and efficient transport connections to and from the region are essential for the competitiveness of both the region and Sweden as a whole. Around 4.3 million people live in the region and contribute to around 49 percent of Sweden's GDP. It is a region with large freight flows both in transit and with the region as a departure point.

It is a welcome development that the entire territory covered by the members of the association now is part of the ScanMed corridor since all regions have direct bearing on the interconnected and coherent traffic system. The Nordic triangle's northern axis, which connects Stockholm and Oslo, should also be included in the ScanMed corridor, especially seeing that it has been identified as of particular importance to the population, the business community as well as the higher education institutions in the region. This is further anchored in the macro-regional agreements on the priorities for the Stockholm-Mälars Region's infrastructure at the national and European level, which have been developed through the Council for the Stockholm Mälars Region's cross regional transportation policy co-operation programme "[En Bättre Sits](#)".

The revision should also include new conditions where the whole functionality of an area is taken into account. Here we specifically point to the Port of Stockholm, which is developed in four separate geographical areas where all parts of the port interact to ensure efficient transport. Currently, one part of the port has core network status, which prevents developing the TEN-T as each part of the port plays an important role in securing capacity and removing bottlenecks in the corridor. The revision of the TEN-T regulation should thus consider the whole functionality of an area to create conditions that make it possible for ports structured like the Port of Stockholm to achieve core network status.

Continued focus on the development of transport infrastructure as well as digitalisation and innovation

The aim of the TEN-T regulation can only be achieved if all three focus areas presented by the European Commission – develop the infrastructure, strengthen the quality of the infrastructure, and promote digitalisation and innovation within the TEN-T network – are addressed. The TEN-T regulation should therefore keep the main focus on the development of "traditional" infrastructure while strengthening the quality of the existing infrastructure, digitalisation, and innovation. Digitalisation should be seen as a tool to achieve a more efficient and sustainable transport system. It is important not to underestimate the increased costs that digitalisation will bring for municipalities and regions. The funding available at the EU level to support local and regional actors in the implementation of the digital transformation is currently not proportional.

A systemic approach is needed for the green transition

As proposed by the European Commission the TEN-T network needs to contribute more directly to addressing the climate and sustainability challenges in the transport sector, and the connection between the TEN-T and the European Green Deal is a welcome addition. However, a greater focus is needed on applying a systemic approach in the spatial planning as a starting point for the TEN-T since several different actions need to work together to achieve the climate goals.

To achieve a more transport efficient society, the focus should be on behavioural change to reduce private car journeys, increase travel with public transport, cycling and walking as well as multimodal mobility with transfer of goods to rail, maritime, and inland waterways. Being open to new technical solutions, the potential provided by digitalisation, and the emergence of new transport modes, will promote more innovative, efficient, and sustainable transport solutions. This applies both to the urban nodes as well as the comprehensive and core network.

The TEN-T should ensure a long-term provision of sustainable alternative fuels, to do so a systemic approach where the transport system is put into context with other aspects of spatial planning is needed. Then a long-term supply of sustainable alternative fuels can be guaranteed along the TEN-T network for the transport sector as well as other important services such as heating and cooling for buildings and digital infrastructure. The revision of the TEN-T regulation should therefore also be coordinated with other EU-initiatives such as the Alternative Fuels Infrastructure Directive, the Energy Performance of Buildings Directive, the Renewable Energy Directive, and the EU taxonomy for sustainable activities. A technology neutral approach is needed that integrates both charging and refuelling infrastructure for electric vehicles, green hydrogen, and biofuels.

Broadening the definition of urban nodes

To ensure the functionality of the network, the definition of urban nodes should be broadened to encompass the entire functional area around a node, including the peri-urban and regional areas around the city centre. A broader definition should exploit the existing potential of the node to increase the share of sustainable journeys. It is also an important measure to facilitate first and last mile of freight traffic where the logistics depends on a well-functioning transport system that makes it possible to also reach more distant customers at the local level.

We support the proposal for a new definition of urban nodes developed by the European networks [ERRIN](#) and [Polis](#)¹:

Amending Article 6 – Dual-layer trans-European transport network structure

Amending Paragraph (1) as follows: “The gradual development of the trans-European transport network shall be achieved, in particular, by implementing a dual-layer structure for that network with a coherent and transparent methodological approach, comprising a comprehensive network and a core network ***with urban nodes as connecting points between the different transport modes and between long distance traffic and the regional and local transport networks.***”

Amending Paragraph (2) e.g. “The comprehensive network shall consist of all existing and planned transport infrastructures of the trans-European transport network as well as measures promoting the efficient and socially and environmentally sustainable use of such infrastructure ***through connectivity and services.***”

Integrating the Motorways of the sea

There is great potential among the association’s members to develop waterborne city logistics and regional freight transport. Inland waterways play an important role and should be integrated and have equal priority in the TEN-T as other infrastructure. A more clear link is also needed between the Motorways of the Sea and the other parts of the TEN-T network to increase the functionality and efficiency.

Monitoring and governance

A good dialogue between the EU and the regional as well as macro-regional level on the European transport system is of great importance, especially to ensure that the opportunities and needs of infrastructure development at different levels are met. The European coordinators for each corridor

¹ More information about the joint ERRIN-Polis position paper on the TEN-T regulation can be found here: <https://www.polisnetwork.eu/news/polis-and-errin-present-recommendations-for-ten-t/>
<https://www.polisnetwork.eu/wp-content/uploads/2020/07/ERRIN-opinion-on-the-revision-of-the-TEN-T-guidelines-June-2020.pdf>

have been and are central in this dialogue. The model with corridor coordinators and meetings with stakeholders along each separate corridor has been successful and should continue with the same mandate and focus in the updated regulation.

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Stockholm Region Association for European Affairs consists of three main members: the City of Stockholm, Region Stockholm and Storsthlm. Other members in the association are Region Uppsala, Region Västmanland, Region Sörmland, Region Gotland, and Mälardalsrådet – the Council of the Stockholm-Mälar Region. The aim of the association is to promote the members' common political interests through collaboration on issues connected to the region's relationship with the EU. Together the members own the [Stockholm Region EU Office](#), which is their joint representative office in Brussels.